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27 Attorneys for Defendant
28 DISH Network Corporation, et al.

19
20 IN THE UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

22 ENTROPIC COMMUNICATIONS,
23 LLC,

24 Plaintiff,

25 v.

26 DISH NETWORK CORPORATION, *et*
27 *al.*,

28 Defendants.

Lead Case No. 2:23-cv-1043-JWH-KES

**JOINT STIPULATION RE:
DEADLINE TO RESPOND TO
OPERATIVE COMPLAINT AND
COUNTERCLAIMS; [PROPOSED]
ORDER**

District Judge: Hon. John W. Holcomb
Magistrate Judge: Hon. Karen E. Scott

1 DISH NETWORK CALIFORNIA
2 SERVICE CORPORATION,

3 Counter-Claimant,

4 v.

5 ENTROPIC COMMUNICATIONS,
LLC, *et al.*,

6 Counter-Defendants.

1 Plaintiff Entropic Communications, LLC (“Entropic”); Defendants DISH
2 Network Corporation; DISH Network L.L.C.; Dish Network Service L.L.C.; and Dish
3 Network California Service Corporation (collectively, “Defendants”); and Counter-
4 Defendants Maxlinear, Inc. and Maxlinear Communications LLC (“Maxlinear”)
5 (collectively with Entropic and Defendants, the “Parties”), by and through their
6 respective counsel, enter into this Joint Stipulation relating to upcoming deadlines, as
7 follows:

8 **WHEREAS**, on February 10, 2023, Entropic filed its Complaint against DISH
9 Network Corporation; DISH Network LLC; Dish Network Service LLC; and Dish
10 Network California Service Corporation (Dkt. No. 1) and served the same on
11 Defendants (Dkt. Nos. 14-17);

12 **WHEREAS**, DISH Network Corporation; DISH Network L.L.C.; Dish
13 Network Service L.L.C. (“the Dish Colorado Defendants”) moved this Court to
14 dismiss Entropic’s claims against them for improper venue (Dkt. No. 49) on May 8,
15 2023;

16 **WHEREAS**, Dish Network California Service Corporation (“Dish
17 California”) filed its Answer to the Complaint and Counterclaims on September 21,
18 2023 (Dkt. No. 111) and served the same on Entropic (Dkt. No. 117). In view of the
19 motion to dismiss, the DISH Colorado Defendants have not yet answered Entropic’s
20 complaint;

21 **WHEREAS**, on December 22, 2023, MaxLinear filed a motion to dismiss the
22 Counterclaims filed against it by Dish California (D.I. 235);

23 **WHEREAS**, on December 27, 2023, this Court entered an Order granting a
24 joint stipulation between Dish California and Entropic setting certain deadlines based
25 on when the Court would enter an order on the Dish Colorado Defendants’ then-
26 pending motion to dismiss for improper venue (D.I. 242);

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WHEREAS, on January 3, 2023, Dish California filed an ex parte application requesting that the Court reset certain deadlines relating to MaxLinear's motion to dismiss (D.I. 252);

WHEREAS, on January 10, 2024, this Court entered an order denying the Dish Colorado Defendants' motion to dismiss for improper venue (D.I. 269);

WHEREAS, on January 11, 2024, this Court entered an Order concerning Dish California's ex parte application, directing the Parties to meet and confer and promptly file a joint stipulation providing for an aligned briefing schedule (D.I. 271);

NOW THEREFORE, the Parties, by and through their respective counsel, hereby **STIPULATE AND AGREE** as follows:

1. The deadline for the DISH Colorado Defendants to answer Entropic's complaint shall be **January 31, 2024**. To avoid any doubt, the last day for the DISH Colorado Defendants to file counterclaims against Entropic and MaxLinear is January 31, 2024.
2. The deadline for Dish California to amend its counterclaims and/or otherwise respond to the motion to dismiss filed by MaxLinear (D.I. 235) shall be **January 31, 2024**.
3. The deadline for Entropic and MaxLinear to respond to any counterclaims filed by the DISH Colorado Defendants and any amended counterclaims filed by Dish California shall be **February 21, 2024**. If Dish California does not amend its counterclaims, the deadline for Entropic to respond to such counterclaims is **February 21, 2024**.
4. The deadline for the DISH Colorado Defendants and Dish California to file their opposition to any motions to dismiss filed by Entropic and MaxLinear in response to any counterclaims filed by DISH Colorado Defendants and counterclaims or amended counterclaims filed by Dish California shall be **March 5, 2024**.

- 1 5. The deadline for Entropic and MaxLinear to file replies in support of any
- 2 motions to dismiss any counterclaims filed by DISH Colorado Defendants
- 3 and counterclaims or amended counterclaims filed by Dish California shall
- 4 be **March 15, 2024**
- 5 6. Subject to the Court's schedule, any motions to dismiss filed by Entropic
- 6 and MaxLinear in response to any counterclaims filed by DISH Colorado
- 7 Defendants and counterclaims or amended counterclaims filed by Dish
- 8 California will be heard on **March 29, 2024**.
- 9 7. The DISH Colorado Defendants and Dish California shall not seek
- 10 discovery from Entropic or MaxLinear regarding any counterclaims filed by
- 11 DISH Colorado Defendants and counterclaims or amended counterclaims
- 12 filed by Dish California until **February 21, 2024**, when Entropic and
- 13 MaxLinear respond to any counterclaims or amended counterclaims filed
- 14 against them.

15
16
17 Dated: January 12, 2024

Respectfully Submitted,

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22 **AND MAXLINEAR**
23 **COMMUNICATIONS LLC**

ECF ATTESTATION

I, Oliver J. Richards, am the ECF User whose identification and password are being used to electronically file this Joint Stipulation. In accordance with Local Rule 5-4.3.4, concurrence in and authorization of the filing of this document has been obtained from the counsel of Plaintiff Entropic Communications, LLC and Counter-Defendants Maxlinear, Inc. and Maxlinear Communications LLC and will maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ *Oliver Richards*

Oliver Richards